

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CENTER CITY HEALTHCARE, LLC d/b/a
HAHNEMANN UNIVERSITY HOSPITAL, *et al.*,¹

Debtors.

CENTER CITY HEALTHCARE, LLC d/b/a
HAHNEMANN UNIVERSITY HOSPITAL, *et al.*
and TPS V of PA, LLC,

Plaintiffs,

v.

SANOFI PASTEUR INC.,

Defendant.

Chapter 11

Case No. 19-11466 (MFW)

(Jointly Administered)

Adv. Proc. No. 21-50985 (MFW)

**THIRD STIPULATION EXTENDING CERTAIN DATES
CONTAINED IN THE PROCEDURES ORDER**

Plaintiffs Center City Healthcare, LLC d/b/a Hahnemann University Hospital (“CCH”) and TPS V of PA, LLC (“TPS V” and, together with CCH, “Plaintiffs”), and defendant Sanofi Pasteur Inc. (“Defendant” and, together with Plaintiffs, the “Parties”) hereby stipulate and agree, by and through undersigned counsel, as follows:

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Center City Healthcare, LLC (3341), Philadelphia Academic Health System, LLC (8681), St. Christopher’s Healthcare, LLC (8395), Philadelphia Academic Medical Associates, LLC (8165), HPS of PA, L.L.C. (1617), SCHC Pediatric Associates, L.L.C. (0527), St. Christopher’s Pediatric Urgent Care Center, L.L.C. (6447), SCHC Pediatric Anesthesia Associates, L.L.C. (2326), StChris Care at Northeast Pediatrics, L.L.C. (4056), TPS of PA, L.L.C. (4862), TPS II of PA, L.L.C. (5534), TPS III of PA, L.L.C. (5536), TPS IV of PA, L.L.C. (5537), and TPS V of PA, L.L.C. (5540). The Debtors’ mailing address is 216 N. Broad Street, 4th Floor, Philadelphia, Pennsylvania 19102.

WHEREAS, on June 28, 2021, Plaintiffs filed *Complaint for Avoidance and Recovery of Transfers Pursuant to 11 U.S.C. §§ 547, 548 & 550 and to Disallow Claims Pursuant to 11 U.S.C. § 502(d)* [Adv. Proc. D.I. 1] (the “Complaint”) initiating the above-captioned adversary proceeding (the “Adversary Proceeding”); and

WHEREAS, on September 7, 2021, Defendant filed and served on Plaintiffs the *Answer and Affirmative Defenses of Sanofi Pasteur Inc. to Plaintiffs’ Complaint to Avoid and Recover Transfers Pursuant to 11 U.S.C. §§ 547, 548, 549 and 550 and to Disallow Claims Pursuant to 11 U.S.C. § 502* [Adv. Proc. D.I. 6]; and

WHEREAS, on September 21, 2021, the Court entered the *Order Establishing Streamlined Procedures Governing Adversary Proceedings Brought by Debtors Pursuant to Sections 502, 547, 548 and 550 of the Bankruptcy Code* [Adv. Proc. D.I. 10] (the “Procedures Order”);² and

WHEREAS, pursuant to paragraph E.13 of the Procedures Order, mediation of all Remaining Avoidance Actions shall be concluded by January 31, 2022; and

WHEREAS, pursuant to paragraph E.14 of the Procedures Order, the parties to any Unresolved Avoidance Action shall be required to provide Initial Disclosures on or before February 15, 2022; and

WHEREAS, pursuant to paragraph E.15 of the Procedures Order, written discovery—including, without limitation, interrogatories, document requests and requests for admission—(“Written Discovery”) shall not be served in any Unresolved Avoidance Actions after March 31, 2022; and

² Capitalized terms used but not herein shall have the meaning ascribed to them in the Procedures Order.

WHEREAS, pursuant to paragraph H.42, the dates contained in the Procedures Order may be extended or modified by consent of the parties pursuant to stipulation, which stipulation shall be filed with the Court (though need not be approved by the Court); and

WHEREAS, on February 9, 2022, pursuant to paragraph E.11 of the Procedures Order, Ian Connor Bifferato, Esq. (the “Mediator”) was appointed as mediator in the Adversary Proceeding, *see* Adv. Proc. D.I. 13;

WHEREAS, on March 23, 2022, the Parties agreed to extend certain dates contained in the Procedures Order, *see* Adv. Pro. D.I. 16;

WHEREAS, on May 34, 2022, the Parties agreed to extend certain dates contained in the Procedures Order, *see* Adv. Pro. D.I. 17; and

WHEREAS, the Parties have agreed to further extend certain dates contained in the Procedures Order while they engage in settlement discussions.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, as follows:

1. The Parties shall have through and including July 8, 2022 to serve Initial Disclosures and Written Discovery. The deadlines contained in paragraphs 16 to 22 of the Procedures Order are stayed (the “Stayed Deadlines”). If the Adversary Proceeding has not been resolved as of July 8, 2022, the Parties will contact the Mediator to discuss scheduling of the mediation. Should mediation not be successful, the Parties will file a further stipulation setting new deadlines for the Stayed Deadlines.

IT IS SO STIPULATED.

**KLEHR HARRISON HARVEY
BRANZBURG LLP**

/s/ Sally E. Veghte

Sally E. Veghte (DE No. 4762)
919 North Market Street, Suite 1000
Wilmington, Delaware 19899
Telephone: (302) 426-1189
Email: sveghte@klehr.com

Counsel to the Plaintiffs

**TROUTMAN PEPPER HAMILTON
SANDERS LLP**

/s/ Evelyn J. Meltzer

Evelyn J. Meltzer (DE No. 4581)
Hercules Plaza, Suite 5100
1313 N. Market Street,
P.O. Box 1709
Wilmington, Delaware 19899-1709
Telephone: (302) 777-6500
Email: evelyn.meltzer@troutman.com

Counsel for Sanofi Pasteur Inc.